

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a) Case No. 16-cv-1054 (WMW/DTS)
Delaware corporation,)
)
Plaintiff,)
) **Jury Trial Demanded**
v.)
)
FEDERAL INSURANCE COMPANY,)
an Indiana corporation and ACE)
AMERICAN INSURANCE COMPANY,)
a Pennsylvania corporation,)
)
Defendants.)
)

**DECLARATION OF HEATHER KLIEBENSTEIN IN SUPPORT OF
PLAINTIFF’S OBJECTION TO ORDER GRANTING
DEFENDANT’S MOTION TO AMEND**

I, Heather Kliebenstein, declare as follows:

1. I am a shareholder with Merchant & Gould P.C., and I am one of the attorneys of record for Plaintiff Fair Isaac Corporation in the above captioned matter.

2. I make this Declaration on my own information, knowledge, and belief in support of Plaintiff's Fair Isaac Corporation's Objection to Order Granting Defendant's Motion to Amend.

3. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff' Fair Isaac Corporation's First Set of Requests for Production of Documents to Defendant Federal Insurance Company dated April 11, 2017.

4. Attached hereto as Exhibit 2 is a true and correct copy of Defendant's Notice of 30(b)(6) Deposition of Plaintiff Fair Isaac Corporation dated July 27, 2018.

5. Attached hereto as Exhibit 3 is a true and correct copy of the September 11, 2018 deposition transcript of Oliver Clark. This document is filed UNDER SEAL.

6. Attached hereto as Exhibit 4 is a true and correct copy of the July 29, 2013 email between Chubb employees Ewen Setti and Henry Mirolyuz and produced as FED012641_0001 - FED012641_0002. This document is filed UNDER SEAL.

I declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: September 9, 2019

/s/ Heather Kliebenstein
Heather Kliebenstein